

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANGELA MARIA FABBRO
Plaintiff

v.

1:19-CV-05764(ENV)(SJB)

JONATHAN BLAKE &
CLAYTON GUNARS-STRAUTS
Defendants.

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant, Jonathan Blake, respectfully moves the Court to extend his time to respond to the Complaint to **March 13, 2020**. Plaintiff has consented to this motion.

According to the Certificate of Service filed by Plaintiff on February 24, 2020, the Plaintiff claims it effectuated proper service on Defendant Blake on January 28, 2020 under the Hague Convention by delivering a copy of the summons and complaint to an individual named Emily Laycock, the Office Manager at Blake's alleged place of employment in the United Kingdom. Assuming service was properly made, Defendant Blake's deadline to respond to the Complaint was February 18, 2020.

Good cause exists to allow Defendant Blake until March 13, 2020 as Blake, a resident of the United Kingdom, has just retained the undersigned US counsel to represent him in this matter, and because Blake intends to defend this action. Moreover, Plaintiff will suffer no prejudice as a result of this extension, and has consented to this extension.

Accordingly, Defendant Blake respectfully requests that its deadline to respond to the Complaint be extended to **March 13, 2020**.

Respectfully submitted,

/s Jeffrey A. Lindenbaum
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February 28, 2020

CERTIFICATE OF FILING AND SERVICE

I, Jeffrey A. Lindenbaum, hereby certify that on February 28, 2020, I filed the above Motion for Extension using the Court's ECF system, which will send notification to all counsel of record.

_____/s Jeffrey A. Lindenbaum_____